
From: Henderson, Kim/SDO <Kimberly.Henderson@CH2M.com>
Sent: Wednesday, September 27, 2017 5:09 PM
To: Brooks, George P CIV; Slack, Matthew L CIV SEA 04 04N; Janda, Danielle L CIV;
Robinson, Derek J CIV NAVFAC HQ, BRAC PMO; Edwards, Zachary L CIV SEA 04 04N
Subject: [Non-DoD Source] FW: RTC's SAP Field Sampling Plan and Quality Assurance Project Plan Dated June 2017
Attachments: DTSC_CDPH comments on SAP rad Eval 7.31.2017.pdf; HPNS SAP Comments Matrix_092717.xlsx

Oops! We missed responding to DTSC comments on the SAP as they were embedded in an email. Please see attached RTCs for your review. If you don't need to review, please let me know. I'd like to send these back to Nina this week.

From: Bacey, Juanita@DTSC [mailto:Juanita.Bacey@dtsc.ca.gov]
Sent: Thursday, September 21, 2017 2:17 PM
To: Henderson, Kim/SDO <Kimberly.Henderson@CH2M.com>
Cc: Robinson, Derek J CIV NAVFAC HQ, BRAC PMO [derek.j.robinson1@navy.mil] <derek.j.robinson1@navy.mil>; Janda, Danielle L CIV <danielle.janda@navy.mil>; LEE, LILY <LEE.LILY@EPA.GOV>
Subject: Re: RTC's SAP Field Sampling Plan and Quality Assurance Project Plan Dated June 2017 [EXTERNAL]

Hi Kim,

CDPH EMB has indicated to you that they have no further comments. However, the RTCs don't seem to address DTSC's comments (see attached). I thought we discussed this previously ? See attached email.

Nina

510-913-0763

From: Jue, Tracy (CDPH-EMB) <Tracy.Jue@cdph.ca.gov>
Sent: Tuesday, September 19, 2017 2:38 PM
To: 'Kimberly.Henderson@CH2M.com'; Bacey, Juanita@DTSC
Cc: Singh, Sheetal (CDPH-EMB)
Subject: RTC's SAP Field Sampling Plan and Quality Assurance Project Plan Dated June 2017

Hi Kim:

EMB has no further comments on the SAP document. However, EMB would like to review the redline strikeout which includes the incorporated information. Also EMB would like to review the Radiological Work Plan when the document is available for review.

Thank You,

Tracy

Bacey, Juanita@DTSC

From: Bacey, Juanita@DTSC
Sent: Monday, July 31, 2017 2:38 PM
To: Robinson, Derek J CIV NAVFACHQ, BRAC PMO (derek.j.robinson1@navy.mil)
Cc: Janda, Danielle L CIV NAVFAC SW (danielle.janda@navy.mil); LEE, LILY (LEE.LILY@EPA.GOV); Ures, Tina@Waterboards; Jue, Tracy (CDPH-EMB); Singh, Sheetal (CDPH-EMB); Amy.Brownell@sfdph.org
Subject: HP - Draft SAP for Rad Data Evaluation
Attachments: EMB Comments SAP for HPS.pdf

Hi Derek,

DTSC has reviewed the draft Sampling and Analysis Plan (SAP) Radiological Data Evaluation and Confirmation Survey dated June 26, 2017. We are providing the following comments below. In addition, CDPH EMB has provided comments in the form of a memo (attached). If you have any questions, feel free to contact me.

General Comment

1. The SAP did not contain Task-Specific Sampling Plans (TSPs). DTSC understands that historically TSPs have been provided by the Navy to the regulatory agencies after the field activities have been completed. However, due to the sensitive nature of the radiological data re-evaluation investigation, review and concurrence by DTSC and the other regulatory agencies involved will be required prior to the start of any field activities.

Specific Comments

1. Executive Summary – Indicates that each TSP will be provided to the Navy for review and approval prior to implementation. Please add regulatory agencies in addition to the Navy.
2. Worksheet #11 – Step 1, 2nd sentence – States “*This led to suspicion that the soil samples were collected from a location different from the one specified in the Final Status Survey Report*”. It was DTSCs understanding that none of the falsified soil samples were ever reported in a Final Final Status Report. If this is correct, please revise as follows: “**draft** Final Status Report”.
3. Worksheet #11 – Step 1, paragraph 1, last sentence – Please revise the sentence as follows: *The results and the actions taken are presented in a report finalized in 2014*.
4. Worksheet #11 – Step 1, paragraph 2, first sentence – It is my understanding that the data re-evaluation effort began in 2016, after the accusation of one worker, and additional workers came forward in 2017. Therefore, the sentence should be revised as follows: : *In 2016 and 2017, former workers.....*
5. Worksheet #11 – Step 5, first sentence – Indicates radiological data will be compared to the “*range of naturally-occurring radionuclide activity.....*” How will the range be determined? DTSC and CDPH EMB require concurrence on the development of a naturally occurring radionuclide activity range for the Hunters Point Site.
6. Worksheet #14 – Task Specific Plans – See Specific Comment 1 above.
7. Worksheet #16 – Project Schedule – requires updating
8. Worksheets #17, #18, and #21 - These worksheet appear to be inadequate because they provide no information but refer to a TSP that was not provided for review. Please provide TSPs for review as soon as possible.
9. Worksheet #17 – Table 17-1 Note a references AEC Regulatory Guide 1.86. It should be noted here that AEC Reg Guide 1.86 was changed to NRC Reg Guide 8.23 and, that the information provided in the table has not changed.

Thank you.

Nina Bacey, Project Manager
Sr. Environmental Scientist
Brownfields & Environmental Restoration
CalEPA – CA Dept. of Toxic Substances Control

700 Heinz Ave, Berkeley, CA 94710

(510) 540 - 2480

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General Comments
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Specific Comments
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**Response to DTSC Comments dated July 31, 2017 on San
Radiological Data Evaluation and Confirmati
Hunters Point Naval Shipyard
San Francisco, California**

Comments
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Executive Summary - Indicates that each TSP will be provided to the Navy for review and approval prior to implementation. Please add regulatory agencies in addition to the Navy.
Worksheet #11 - Step 1, 2nd sentence - States "This led to suspicion that the soil samples were collected from a location different from the one specified in the Final Status Survey Report". It was DTSC's understanding that none of the falsified soil samples were ever reported in a Final Final Status Report. If this is correct, please revise as follows: "draft Final Status Report".
Worksheet #11 - Step 1, paragraph 1, last sentence - Please revise the sentence as follows: The results and the actions taken are presented in a report finalized in 2014.
Worksheet #11 - Step 1, paragraph 2, first sentence - It is my understanding that the data re-evaluation effort began in 2016, after the accusation of one worker, and additional workers came forward in 2017. Therefore, the sentence should be revised as follows: : In 2016 and 2017, former workers.....
Worksheet #11 - Step 5, first sentence - Indicates radiological data will be compared to the "range of naturally-occurring radionuclide activity.." How will the range be determined? DTSC and CDPH EMB require concurrence on the development of a naturally occurring radionuclide activity range for the Hunters Point Site.
Worksheet #14 - Task Specific Plans - See Specific Comment 1 above.
Worksheet #16 - Project Schedule - requires updating
Worksheets #17, #18, and #21 - These worksheet appear to be inadequate because they provide no information but refer to a TSP that was not provided for review. Please provide TSPs for review as soon as possible.
Worksheet #17 - Table 17-1 Note a references AEC Regulatory Guide 1.86. It should be noted here that AEC Reg Guide 1.86 was changed to NRC Reg Guide 8.23 and, that the information provided in the table has not changed.

**Sampling and Analysis Plan
Completion Survey**

Responses
Request noted. The Task-Specific Sampling Plans (TSPs) will be made available to DTSC for review prior to the start of any field activities.
The Executive Summary will be revised to indicate that the TSP will be provided to regulatory agencies for review and approval prior to implementation.
This statement will be revised to "This led to suspicion that the soil samples were improperly collected." as stated in the Executive Summary.
The SAP will be revised as requested.
The SAP will be revised as requested.
Historical background data is being used for background comparisons. The term "range" referred to the wide range specific to each isotope and can be removed to avoid confusion.
The TSPs will be made available to DTSC for review prior to the start of any field activities.
The project schedule will be updated in the SAP and again in each individual TSP as required.
The TSPs will be made available to DTSC for review prior to the start of any field activities.
Although Reg Guide 1.86 was changed to Reg Guide 8.23 "Radiological safety surveys at medical institutions", HPNS is not considered a "medical institution". Therefore, Reg Guide 1.86 is still considered appropriate as it was referenced and used while HPNS was in operation.